



TEXAS DEPARTMENT OF HEALTH

“Public Health: Everyone, Everyday, Everywhere”



Special Supplemental Nutrition Program for Women, Infants, and Children State Plan of Operations FY 2001

**NOTE: This is a proposed Plan and subject to approval by the
United States Department of Agriculture's (USDA) Food and Nutrition Service.
Submitted to USDA on August 15, 2000.**

**The public is provided the opportunity to comment on the State Plan
through the Department's web site: www.tdh.state.tx.us/wichhd**

INTRODUCTION

Welcome to Texas WIC!

The Special Supplemental Nutrition Program for Women, Infants, and Children is a federally funded service that is administered in the Lone Star State by the Texas Department of Health. Its mission is to serve as an adjunct to good health care. The Program is intended to prevent the occurrence of health problems and improve the health status of participants during critical times of growth and development. By providing nutrition education and food assistance to those categories of people who have been found to be the most vulnerable to the effects of malnutrition, WIC aims to achieve optimal nutritional status for children prior to entry into school.

Texas WIC's goal is to deliver the highest quality services in the nation to 100% of the funded potential WIC eligible population. These services are provided to children under the age of 5, pregnant women, breastfeeding women, and women who have recently had a baby. They include nutrition screening, nutrition counseling, breastfeeding support, and prescriptions for supplemental foods. Eligibility is based on income and nutritional risk and all services WIC provides are free of charge.

This Plan represents an overview of the major goals, objectives and operational standards of the Program for fiscal year 2001 and is guided by the Texas Department of Health's strategic plan for 2001-2005 which sets forth the principles which guide TDH's public health activities as follows:

- Support community-based solutions;**
- Ensure that public health efforts lead to improved health outcomes;**
- Make prevention the priority of public health efforts; and**
- Carry out the state's leadership role.**

The Plan is also guided by the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS) strategic plan for 2000-2005. FNS is part of the USDA's Food, Nutrition, and Consumer Services and is responsible for oversight of the WIC Program. Texas WIC's 2001 goals and objectives support and compliment the FNS Strategic Plan 2000-2005. The FNS Plan focuses on two goals:

- Improved nutrition of children and low-income people**
- Improved stewardship of federal funds**

The State Plan process is part of the ongoing work WIC must do to meet its goals and objectives. By continually reassessing what we do and why we do it, we ensure that we are focusing on priorities that will have the greatest impact in improving health.

GOALS AND OBJECTIVES

I. VENDOR MANAGEMENT

Goal #1: Continue improvement of vendor management by further refinement of vendor policies/processes in conjunction with modifications to the vendor agreement document and the vendor agreement process.

Objective A: Modify the policy adoption and implementation process for policies to be effective for FY 2001.

Most vendor policies will be removed from the Texas Administrative Code effective October 1, 2000. Future modifications to policies affecting vendors already under contract will then be greatly expedited. Vendor policies will become solely a contract issue as they will be strictly contract addenda and not a state rule.

Objective B: Modification of Policy FD: 30.0, "Vendor Contract/Policy Violations."

Activities:

1. Submit to USDA for review and approval changes to the definition of pattern for the nine violations for which federal rule mandates the disqualification period. The modification is intended to provide vendors a written warning prior to imposing the mandated disqualifications.
2. Upon approval by USDA, provide written notification of the policy change to Texas WIC vendors.

Objective C: Incorporate policy changes necessitated by FNS's issuance of final vendor regulations expected to be published in October or November of 2000.

Activities:

1. Staff review of policy changes needed.
2. Draft and process policy changes as warranted, as either a

- formal rule to be placed in the Texas Administrative Code (policies that affect entities not under contract) or as simple contract amendments (policies effecting entities already under contract). Regardless, all policy changes will be submitted to the USDA regional office for review and approval.
3. Distribute revised policies as contract addenda via the use of a quarterly vendor bulletin.

Objective D: Modify the vendor agreement language regarding policy changes during the terms of the contract.

Activities:

1. Effectuate a vendor agreement for FY 2001 that includes a term “incorporating by reference” all vendor policies as addenda to the agreement and that binds vendors to quarterly bulletins announcing changes in terms/policies. The vendors will have the opportunity to accept the changes or to vacate their agreement.
2. Publish and distribute to vendors quarterly bulletins even if no modifications are needed.

Objective E: Effectuate changes to vendor agreement and policies needed for vendors in the Electronic Benefit Transfer (EBT) pilot counties of El Paso and Hudspeth.

Activities:

1. Vendors in El Paso and Hudspeth Counties will have an addenda to their agreement specifying the Terms and Conditions relative to EBT.

Objective F: Continue refinement of policy modifications necessitated by conversion to an EBT methodology.

Activities:

1. Draft policy modifications as EBT business rules are finalized.
2. Submit policies to USDA for review and approval.
3. Disseminate EBT policy changes to El Paso vendors via the

quarterly bulletin methodology.

Goal #2: Continue improvement of vendor management by developing and disseminating training materials to vendors.

Objective A: Complete shooting of video for managers and disseminate to all grocer accounts.

Activities:

1. Complete shooting of video using script developed in FY 2000.
2. Produce copies in English and Spanish and distribute one to each vendor account.

Objective B: Complete revision of vendor Cashier Training Manual and disseminate to all grocer accounts.

Activities:

1. Consolidate the Cashier Training Manual used by the Training Section and the one used for dissemination with contracts into a single manual.
2. Distribute consolidated manual to all vendors.
3. Use consolidated manual for all vendor training events.

Objective C: Complete revision of “Allowable Food List” for use in FY 2001.

Activities:

1. Secure printing of Allowable Foods List showing pictures of authorized WIC Products.
2. Distribute copies to all vendor outlets so that all checkers may have a copy readily available at their checkstand.
3. Distribute copies to all WIC clinics for dissemination to WIC participants.
4. Incorporate use of Allowable Foods List into Vendor Training materials.

II. NUTRITION SERVICES

Goal #1: Enhance the delivery of nutrition education and breastfeeding education to participants through the Texas Nutrition Services Integrity Initiative.

Objective A: Develop and implement a competency-based testing system to measure basic nutrition knowledge (i.e., the six core nutrition areas — general, infant, prenatal, breastfeeding, postpartum, and preschool).

Activities:

1. Develop a testing system or modify an existing system from another state.
2. Pilot the system.

Objective B: Continue with the dietetic internship.

Activities:

1. Begin second class of interns January 2001.
2. Closely coordinate with contractor that provides oversight of the interns.
3. Select class to begin in January 2002.

Objective C: Continue development and/or identification of resources for professional development of local agency staff.

Activities:

1. Develop and distribute Individual Counseling Guidelines.
2. Develop and distribute self-study “Fact Sheets” for risk conditions.
3. Develop and/or update self-study nutrition modules, as needed.
4. Investigate the opportunity for local agency staff to participate in Internet-based college nutrition courses.

Objective D: Continue with research related to obesity and anemia among WIC participants.

Activities:

1. Continue collaboration with nutrition faculty at Texas Tech University into reasons some children enrolled in WIC because of obesity or anemia improve, and others do not.
2. Continue collaboration with health education faculty at the University of Texas at Austin to investigate attitudes and beliefs related to infant feeding behaviors.

III. MANAGEMENT INFORMATION SYSTEMS

- Goal #1:** Maintain an effective automation system to support Texas WIC Program operations.
- Goal #2:** Plan/evaluate/design/develop Texas WIN system interoperability with the proposed Electronic Benefits Transfer (EBT) System.
- Goal #3:** Maintain an on-going communication with the EBT technical team during the development of the pilot project.
- Goal #4:** Work with the WIN Evolution systems contractor, state agency program staff, and the Texas Association of Local WIC Directors' Automation Committee to ensure the result of a successful planning document for the next phase of WIN.
- Goal #5:** Examine the current and planned TDH department-wide efforts to integrate health and operational data and reporting of the functional requirements of an integrated system.
- Goal #6:** Identification and reporting of recommended and alternative hardware, software, and telecommunication applications that best support WIC and TDH goals.

IV. STAFFING AND ORGANIZATION

- Goal #1:** Ensure effective and efficient staff support for the Texas WIC Program at the State agency level.
- Objective A:** Examine internal management procedures in order to find ways to improve internal and external Bureau of Nutrition Services communications, staff development, and staff retention.

Activities:

1. Develop guidelines for operational procedures within the Bureau; e.g., signature authorities, travel approval etc.
2. Develop a Bureau training plan for each new employee which includes a mixture of standardized classes and job specific trainings.
3. Develop a standardized Bureau training plan for new supervisors.

Goal #2: Enhance the delivery of nutrition services through staffing and organization of local agencies.

Objective A: Identify local agencies that fall below desirable staffing patterns.

Activities:

1. Continue work begun in FY 2000 to collaborate with these agencies in the identification of methods/steps to move toward desirable staffing patterns.

Goal #3: Improve management of program documentation by continuing to expand use of the WIC Document Imaging System.

Objective A: Through use of the Integrated Workflow, improve selected business processes.

Activities:

1. Expand the use of the Integrated Workflow Process by determining which business processes are well-suited for workflow processing and add these additional processes.
2. Define these processes for use within the application.
3. Continue to refine these processes to improve tracking of WIC business processes.

Objective B: Continue to improve management of program documentation by imaging documents from additional areas of WIC business processes.

Activities:

1. Add subject areas such as finance, purchasing, vendor operations, and clinical management to the file imaging system.
2. Increase the number and quality of documents in the file imaging system to allow easy retrieval of documents and information.
3. Continue to improve customer service in handling phone inquiries and correspondence through document retrieval.
4. Continue to train staff to maximize the access by multiple users of documents.

Objective C: Enhance the WIC WEB site through expanded use of the WEB publishing capability of the imaging system.

Activities:

1. Implement the WEB publishing capabilities of the imaging system.
2. Maintain the latest information on the WIC public WEB site in an automated manner.
3. Maximize the features of the WIC WEB site and the imaging system's WEB publishing capabilities to further the integration of current WIC business processes with the imaging system.

V. NUTRITION SERVICES AND ADMINISTRATIVE EXPENDITURES (NSA)

Goal #1.: Improve management of State agency NSA expenditures

Objective A: Increase knowledge of past and current expenditure composition.

Activities:

1. Compile detailed analysis of FY 2000 final expenditure data.
2. Prepare FY 2001 budget with planned project/activity detail
3. Monitor expenditures/obligations/projections on a monthly basis.
4. Review and discuss with Bureau Chief and Division Directors periodically throughout the fiscal year.

5. Track and review past projections to improve the accuracy of future projections.

Objective B: Increase communications, quantity, quality, and accessibility of financial information available for program management.

Activities:

1. Expand the financial page of the WIC WEB site and update information monthly.
2. Incorporate financial information into graphs for management.
3. Cross train financial management staff to provide greater accessibility and improve processes.

Objective C: Communicate funding rate information and review local agency (LA) funding formula.

Activities:

1. Post information on new funding rates, narratives, incentive funding and new shot rate on the financial page of the WIC WEB site as early as possible.
2. Answer all questions regarding rate factors.
3. Analyze LA funding formula earnings and cost information from current and prior year.
4. Identify trends and summarize findings.
5. Present summary results to Texas Association of Local WIC Directors (TALWD) for further discussion and analysis of LA funding formula.

Objective D: Improve management of Operational Adjustment (OA) funds.

Activities:

1. Obtain and disseminate information on approved OA projects as early as possible.
2. Work with Bureau Chief to set deadline for project start dates.
3. Track status of projects for management.
4. Submit all requests for approval to USDA by September 1, 2001.

5. Submit all requests to redirect funds to USDA by June 1, 2001.
6. Comply with new biannual narrative reporting requirements

VI. FOOD FUNDS MANAGEMENT

Goal #1: Improve management and ensure integrity of food funds management.

Objective A: Increase staff knowledge concerning Texas WIC food funds management areas to better understand the composition, trends, and issues of our present system and to facilitate an easy transition to the new WIC EBT system.

Activities:

1. Perform analysis of current and historical WIC food costs, redemption rates, effects of food package changes, WIC participant buying patterns, and food inflation.
2. Participate in testing and piloting of the WIC EBT automated system and monitor system output continually to ensure integrity of data.
3. Oversee the conversion and compilation of data from both systems in order to report, manage the grant, and ensure integrity of system data.
4. Design WIN system queries to extract food and participant data from WIC EBT system for grant management.

Objective B: Successfully meet all federal reporting requirements.

Activities:

1. Continue to utilize the USDA automated reporting system and explore possibilities of perfecting the printing capability.
2. Report financial and program performance data monthly using the new 798 form.
3. Attend training on financial reporting offered by USDA.

VII. CASELOAD MANAGEMENT

Goal #1: Increase statewide WIC participation to an average of 755,000 per month.

Objective A: Provide effective marketing and outreach activities that support program growth.

Activities:

1. Place television public service announcements in major media markets as needed to support targeted caseload.
2. Provide adequate supplies of updated outreach and marketing materials for use by local agencies and in direct mail campaigns.
3. Continue direct outreach mailings during February and August to pregnant women who are on Medicaid but not participating in WIC.
4. Continue direct outreach mailings to child care centers, job opportunity programs contracted through the Texas Workforce Commission, family planning agencies, food banks, and high schools.
5. Provide ongoing mailings of WIC information through the office of the Texas Attorney General as an insert in child support checks.
6. Provide ongoing mailings of WIC information to Medicaid enrollees through an insert in all new Medicaid Care Identification mailouts and once annually in April with ongoing identification mailouts.
7. Administer contracts for eight Community Outreach Grants that target pregnant women in their first trimester and colonia residents.
8. Analyze available WIN data to target outreach and marketing activities appropriately.

Goal #2: Enhance the quality of WIC services provided to participants.

Objective A: Augment, collaborate, and refer participants and services between WIC and other health and human services programs.

Activities:

1. Continue working collaboratively with Medicaid managed care

- at both the State and local agency levels.
2. Increase the awareness of local WIC and family planning programs of the importance of cross referrals.
3. Coordinate and collaborate with Texas Health Steps and the Child Health Insurance Program to enhance services to program participants.
4. Coordinate and enhance the delivery system for immunization services for participants.

VIII. Certification, Eligibility, and Coordination of Services

Goal #1: Participate in the Texas Department of Health's Service Delivery Integration (SDI) project.

Objective A: Continue the work done in FY 2000 to ensure WIC is appropriately represented in the development and implementation of the SDI pilot project and that USDA approvals are obtained.

Activities:

1. Provide staff as requested for the adjunct teams in policy, contracting, clinical standards, quality assurance and evaluation.
2. Keep USDA and local agencies informed of the progress of the pilots.
3. Participate in the development of the evaluation report due to the legislature as required by HB 2085.
4. Amend the FY 2001 State Plan as needed.

Goal #2: Enhance the quality of services delivered by WIC local agency staff.

Objective A: Enhance the Performance Measures standards.

Activities:

1. Continue the committee to monitor the standards for enhancing the quality of services and the integrity of the WIC Program.

2. Assist local agency directors to perform up to and beyond standards.
3. Involve local agency directors in any discussions related to revisions of the performance standards.

Goal #3: Improve the integrity of the Program through effective policy development and implementation.

Objective A: Ensure compliance with Texas Department of Health (TDH) policy development and implementation requirements.

Activities:

1. Implement the TDH rules planning tool.
2. Ensure appropriate staff attend on a regular basis the workshops and meetings held by the Office of the Board of Health and incorporate information and requirements into the WIC policy process.
3. Complete the process for adoption of formal rules for the WIC program under the provisions of TDH policy and state law on formal rule making. Ensure USDA approval is obtained if necessary.
4. Coordinate with the TDH Office of General Counsel to ensure the Board of Health reviews and approves WIC policy and rules changes if and when required by TDH prior to submission of policy to USDA for approval.
5. Implement the policy for compliance with Rider 18 regarding the reporting of child abuse and neglect as soon as TDH official guidance/policy is finalized and USDA approval can be obtained.

Objective B: Continue to improve the existing WIC Policy and Procedure Manual.

Activities:

1. Continue the work done in FY 2000 to review and overhaul the WIC Policy and Procedure Manual to streamline and improve the clarity of the manual.
2. Continue to streamline and improve the policy development

- and implementation process.
3. Explore the potential of the State agency's newly acquired Imaging System to improve work flows related to policy development, approval, and implementation and to improve the on-line Policy and Procedure Manual.
 4. Explore the potential for development of a policy infobase.
 5. Revise and be ready to reissue the policy manual as needed for implementation of the EBT pilot in El Paso.

Objective C: Implement the provisions of the USDA Interim Rule on Certification Integrity which require applicants to be physically present.

Activities:

1. Issue the approved policy CS: 02.3, Physical Presence, effective October 1, 2000.
2. Ensure local and state agency staff receive technical assistance/training and modify existing training materials as needed.

IX. FOOD DELIVERY/FOOD INSTRUMENT ACCOUNTABILITY

ELECTRONIC BENEFIT TRANSFER (EBT)

Goal #1: Enhance the delivery of WIC food benefits to participants and improve the efficiency of the Program operations:

Objective A: Continue the State agency's developmental work on the WIC EBT system.

Activities:

1. Work with selected EBT Contract Card Integrator to develop the parameters of the system.
2. Conduct weekly internal meetings of WIC State agency staff to refine rules, procedures, policies, reports etc. that will be crucial to the successful implementation of an EBT system. The internal meetings will likely include breakout groups of specialized staff in the areas of food delivery, vendor

management, financial management, clinical operations, and automation.

3. Continually monitor implementation plans and timelines.
4. Conduct stakeholder meetings to brief them on final pilot plans and potential follow-on statewide implementation.
5. Coordinate implementation plans (pilot and full implementation) with New Mexico.

Goal #2: Assess all functional requirements and technical specifications for completeness, clarity and validity.

Objective A: Conduct Joint Application Sessions.

Activities:

1. Identify any requirements or specifications which must be added.
2. Identify any requirements or specifications which must be changed.
3. Identify any requirements or specifications which must be deleted.
4. Identify the impact on Program operations and service delivery of each of these identified changes.

Goal #3: Develop with the EBT Contract Card Integrator comprehensive plans to facilitate the successful development, testing and pilot implementations.

Objective A: Develop the Master Work Plan.

Activities:

1. Identify all project tasks, task dependencies, critical path items, assigned resources, and task completion dates.
2. Update the Master Work Plan through status reports of all changes to the plan including detailed discussions of the reasons for and impact of schedule delays.

Objective B: Finalize the Implementation Plan identifying all tasks, sub-tasks, and schedule deadlines.

Activities:

1. Identify schedule and plans for all demonstration activities prior to initial operations.
2. Identify grocer and third party processor certification schedule for pilot area.
3. Identify State agency, local agency and clinic equipment installation and setup activities.
4. Identify Help Desk setup activities.
5. Identify schedule for design, production, and distribution of cards.
6. Identify schedule for development, productions, and distribution of training materials.

Objective C: Finalize the Training Plan identifying the training needs of WIC State and local agency staff, WIC participants, and WIC vendors.

Activities:

1. Identify major tasks and milestones that must be completed.
2. Identify when specific training materials should be used for successful training of WIC EBT system users and stakeholders.
3. Identify the training methodology to be used, training resource requirements (people, materials, equipment), and training assessment activities.

Objective D: Finalize the Security Plan.

Activities:

1. Specify physical site, hardware, software, user security profile, system and data access, data integrity and other security provisions present within the proposed WIC EBT system.
2. Assure the plan is consistent with the Computer Security Act of 1987, USDA ADP Security Regulations, and FNS EBT Security Manual provisions.

Objective E: Finalize System Backup, Recovery, and Contingency Plan.

Activities:

1. Identify policies and procedures to be followed when evaluating types of natural disasters and system outages that may affect the EBT system's operations and require system and data backup and recovery.
2. Ensure benefits are accessible by WIC participants.
3. Identify the timing and describe any remedial actions that the State, clinic, client, or vendors would be required to perform.
4. Describe the contingencies in the event it is unlikely or impossible that normal operations of the EBT system will resume within a reasonable time.

Objective F: Finalize a Test Plan covering all aspects of the system testing to be conducted.

Activities:

1. Identify the aspects of performance, volume, stress, network, and interface testing.
2. Identify the aspects of testing of the Automated Response Unit and other system support functions.
3. Provide purpose of test, objectives, methodology, environment, test procedures, evaluation criteria, scoring rationale and approval rating, contingency for failed testing, and procedures for subsequent or regression testing to verify the integrity of all system functionality.

X. MONITORING AND AUDITS

Goal #1: Local agencies will meet WIC annual performance measures.

Objective A: Ensure that local agency performance measures are accurately measured and reported.

Activities:

1. Observe clinical operations during all site visits.
2. Run contractor data reports for all on-site visits.

3. Report findings regarding performance measures identified during Quality Assurance (QA) on-site visits to the program upon return from the visit.

Goal #2: All WIC local agencies will be in compliance with State and Federal procedures.

Objective A: Ensure that local agencies are provided technical assistance based on results of QA visits.

Activities:

1. Provide the report with findings identified during QA visit to the program after the visit.
2. Submit a referral from the QA Division to the program regarding the local agency's technical assistance and training needs upon return from the on-site visit.
3. Develop a plan with the QA Division to coordinate fiscal and clinical technical assistance provided to local agencies who require technical assistance during the year.
4. Maintain a log of technical assistance and training provided to local agencies.
5. Provide feedback to the QA Division related to technical assistance and training provided.

Goal #3: Follow-up visits will be made to all local agencies, as required, based on QA findings.

Objective A: Ensure that corrective action submitted by local agencies has been implemented.

Activities:

1. Evaluate the effects of technical assistance and training provided by staff to local agencies.
2. Coordinate follow-up visits between the QA Division staff and WIC clinical staff in order to ensure findings have been corrected.
3. Provide fiscal follow-up visits by WIC fiscal monitors as needed.
4. The QA Division will provide follow-up report copies to the

WIC Program.

Goal #4: Establish an automated QA Information System.

Objective A: Ensure overall accessibility of QA report findings and corrective actions by program via established automated system.

Activities:

1. Continue to work with the Associateship Automation Division to complete and install QA system.
2. Provide accessibility of QA information to program via system.
3. Ensure that the information system is maintained.
4. Utilize the department-wide automated system which collects program-related, quality assurance and financial information about contractor's performance history, monitoring priority and tentative and confirmed on-site monitoring visits.

Goal #5: Enhance the integrity of WIC certification and intake procedures.

Objective A: Monitor compliance of local agencies with all State agency certification policies and procedures through monitoring every other year.

Objective B: Continue risk-assessment activities to identify potential non-compliance of deviation from standard practices.

Activities:

1. Review the current QA risk assessment tools.
2. Update risk assessment tools as applicable to ensure effectiveness.
3. Provide technical assistance or accelerated monitoring to verify intake system integrity.
4. Develop a criteria or guide for unannounced monitoring reviews and resulting reports.

XI. CIVIL RIGHTS

Goal #1: Enhance the quality of civil rights training for local agency staff.

Objective A: Respond to local agency requests for assistance with regard to civil rights issues within 24 hours of request (non-compliance).

Activities:

1. Review all civil rights training materials provided to local agencies by the State agency.
2. Identify training materials where upgrades are needed.
3. Schedule revision of identified materials. Produce at least one new self-paced manual and one computer-based training manual.
4. Provide technical assistance to local agencies within the timeframes requested.

Goal #2: Enhance the State agency staff's awareness of civil rights issues and procedures.

Objective A: Provide State agency staff with information on civil rights developments and procedures at least annually.

Activities:

1. Require each State agency employee to read and be familiar with State agency policies on civil rights.
2. Discuss civil rights issues as part of the Performance Journal counseling, as needed.
3. Circulate information and materials among State agency staff related to civil rights issues as they arise.